HEALTHCARE BEGINS HERE

In-Store Licensed Sales Agent

Code of Conduct & Program Agreement

This Agreement governs your participation in the Healthcare Begins Here in-store Medicare enrollment program at Walmart and Sam's Club retail locations, operated in collaboration with Innovative Financial Group (IFG). By signing below, you confirm that you have read, understand, and agree to every provision as a condition of your participation.

1. LICENSING & APPOINTMENTS

- Maintain an active state insurance producer license and valid carrier appointments for every product you present or enroll.
- Complete all required carrier training and certifications before staffing any store location.
- Represent a minimum of two (2) MA/PDP carriers at each staffed location.
- Never offer, quote, or enroll a customer in a plan for which you are not currently contracted, appointed, and credentialed.
- Always advise customers that the plans you offer represent only a selection of available options; direct them to Medicare.gov for a complete list.

2. SCHEDULING & ATTENDANCE

- Staff each assigned store a minimum of three (3) days per week and no fewer than thirty (30) hours per week.
- Enter all scheduled events into the Sunfire Retail portal under your name and agent ID at least four (4) calendar days before each event. No placeholder scheduling is permitted.
- Arrive at least fifteen (15) minutes before your scheduled start time and check in with the In-Store Champion. During your first shift each week, post your complete weekly schedule at the kiosk in a clear, legible format.
- Cancellations require four (4) calendar days' advance notice. Work with your FMO to identify a replacement agent first; notify both IFG and your FMO if no replacement is found.
- An unexcused no-show constitutes a violation of CMS and Program requirements and will result in corrective action up to and including termination from the Program.
- Agents are not permitted to staff stores November 27–29 (Walmart Black Friday period). Kiosks will be removed and reinstalled by Walmart during this window.

3. STORE INTRODUCTION & RELATIONSHIPS

- At your initial store introduction, present the Store Manager with a government-issued photo ID, a copy of your state insurance license, a business card, and your IFG Letter of Authorization.
- Introduce yourself to the Store Manager, Pharmacy Manager, Vision Center Manager, and key associates. Check in with the In-Store Champion weekly and review the upcoming schedule.
- Never dispute or argue with store management about kiosk placement, access, or conduct. Comply first; then contact IFG Assist to resolve the issue.
- Report kiosk damage to IFG immediately (877.230.3316). Do not attempt to repair, move, or reinstall kiosk equipment yourself.

4. CONDUCT IN-STORE

- Remain at your assigned kiosk area at all times. You may not move through the store to seek out or solicit customers.
- Wait to be approached by customers. Agents may not engage in conduct prohibited by CMS Medicare marketing regulations, including unsolicited marketing activities.

- Do not solicit, market to, or enroll Walmart or Sam's Club associates for personal insurance. If an associate inquires, refer them to their HR Manager, HealthCompare (888-748-5152), or the Walmart Benefits Service Team (800-421-1362).
- Do not solicit in-store pharmacists or healthcare providers for customer referrals or patient demographic information.
- Do not conduct any marketing or enrollment activity where care is administered, including the pharmacy counter or vision center.
- Keep your kiosk clean, organized, hazard-free, and stocked with carrier-approved enrollment kits. Remove all enrollment kits and materials from the kiosk at the end of each shift.
- Do not offer gifts, food, incentives, or promotional items of any kind to customers or Walmart associates.
- Wear your IFG-issued name badge and approved marketing button at all times. Carrier-branded clothing and accessories are strictly prohibited.
- Do not post handwritten or unapproved signage. Only post your weekly schedule on the designated kiosk board.
- Limit personal phone and device use to an absolute minimum. Do not read books, magazines, or newspapers during scheduled shifts.

5. SOCIAL MEDIA

You may advertise your Walmart in-store hours on your personal or business social media (Facebook, LinkedIn, Twitter) during AEP only, subject to the following:

- Use only the pre-approved generic advertisement provided in the Walmart HBH Agent Toolkit. You may add only your name, day, time, and store location. All other content must remain unchanged.
- Never post carrier names, logos, plan names, premiums, or benefit details. Never target individuals (including via direct message, tagging, or commenting).]. Do not initiate contact with individuals who engage with your post. Any beneficiary interactions must comply with applicable CMS marketing requirements and Program guidelines.

6. ENROLLMENT PERIODS & RESTRICTIONS

- AEP (Oct 15 – Dec 7): Do not solicit or accept Medicare plan applications before October 15. Agents found violating this rule will be removed from the store immediately.
- OEP (Jan 1 – Mar 31): Do not target, approach, or ask MA or Part D enrollees about making a plan change. You may only discuss OEP if the customer independently initiates the inquiry or expresses dissatisfaction with their current plan.

7. MARKETING & SALES STANDARDS

- Begin every customer interaction with a needs-based analysis. Recommend only the plan or plans that genuinely best fit the customer's individual needs and circumstances — without carrier bias and without regard to commission.
- Display information on all carriers you represent at every event. Do not give preferential marketing or preferential treatment to any plan based on Walmart's network relationships (pharmacy, vision, clinic, etc.).
- Agents must obtain and document a Scope of Appointment whenever required under applicable CMS Medicare marketing regulations and carrier requirements.
- If a customer is attending a previously scheduled appointment, complete a Scope of Appointment before discussing plans.
- Adhere to all CMS marketing prohibitions, including those against twisting, high-pressure tactics, cold-lead marketing, unsolicited contact, and cherry-picking.
- Do not discuss or offer any non-health insurance product or unrelated service to any Walmart customer.

8. SUNFIRE RETAIL & ENROLLMENT RECORDING

- Use Sunfire Retail for every enrollment originating from an in-store event — including MA, Med Supp, PDP, D-SNP, C-SNP, ACA, and all non-participating or manual carrier entries. No exceptions.

- All policies sold to Walmart customers — whether completed in-store, online, or in the customer's home — must be processed through the Sunfire Retail Portal if the lead originated at Walmart.
- Check in and check out of every event within the 30-minute window in Sunfire. Failure to record enrollments is a material breach and may result in termination and/or contractual remedies.

9. CUSTOMER EXPERIENCE STANDARD

- Deliver an experience, not a transaction. Every customer interaction should leave the beneficiary clearer, calmer, and more confident than when they arrived.
- Conduct a full NEADS analysis (Now, Existing, Anticipated, Decision-Maker, Solution) before recommending any plan.
- Set accurate expectations on enrollment timelines, effective dates, and next steps. Never rush a customer toward a decision.
- Protect all customer PHI and PII in accordance with HIPAA and all applicable federal and state privacy laws. Never leave documents containing PHI/PII unsecured.

10. TECHNOLOGY & EQUIPMENT

- Maintain reliable internet connectivity during every shift (Walmart guest Wi-Fi or a personal hotspot). Bring a charged backup power source — outlets are not guaranteed at all kiosk locations.
- Notify IFG Assist immediately of any technology failure that prevents Sunfire access. Do not hold enrollments in memory to enter later; pause and resolve before proceeding.

11. INDEMNIFICATION

You agree to indemnify and hold harmless Walmart, IFG, and their respective affiliates, directors, officers, and employees against any and all losses, damages, liabilities, costs, and expenses (including reasonable attorneys' fees) arising from any third-party claim, proceeding, or investigation related to your acts or omissions in connection with this Program.

12. VIOLATIONS & DISCIPLINARY ACTION

Violations are investigated by IFG and reported to participating carriers and, where applicable, to state insurance commissions and CMS. The following disciplinary ladder applies:

- First offense (low severity): Verbal counseling and additional training.
- Second offense (low severity) or first offense (medium severity): Formal written notice, additional training, and a corrective action plan.
- Third offense (low severity), second offense (medium severity), or any gross misconduct (fraud, abuse, discrimination): Suspension or termination from the Program.

Suspensions and terminations are reported to all participating carriers and FMOs. Agents on IFG's internal violator list may not participate in the Program in future years. IFG may also remove other agents within the same FMO and/or terminate the FMO's license agreement. Agents must fully cooperate with any investigation by IFG, participating carriers, or their FMO.

13. QUESTIONS & SUPPORT

When in doubt, contact IFG Assist before acting.

Phone: 877.230.3316 (Mon–Fri 8 AM–6 PM · Sat during AEP 9 AM–6 PM)

Email: retailsupport@teamifg.com (24–48 business hour response)

Agent Acknowledgment & Signature

By signing below, I confirm that I have read this Code of Conduct in its entirety, understand my obligations, and agree to comply with all provisions as a condition of my participation in the Healthcare Begins Here in-store Medicare enrollment program.

Agent Printed Name		NPN (National Producer Number)
Agent Signature		Date
Walmart Store Number		